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July 6, 2023

BY ECF

Hon. Naomi Reice Buchwald United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

> Re: Lachlan Cartwright v. City of New York, et al., 22-cv-07198 (NRB)

Your Honor:

Application I represent Plaintiff Lachlan Cartwright. I write jointly with Defendants to ask that the Court extend the current July 15, 2023 deadline by which Plaintiff must submit a status update or proposed briefing schedule as to the only remaining issue in this case attorney's fees, costs, and expenses in this matter - by 45 days, to August 29, 2023. The parties made one such previous request, on May 31, 2023 (ECF 22), which the Court granted. Since that application, the City has obtained settlement authority and conveyed an offer, and the parties are now engaged in good faith conversations and negotiations. If the Court gives us the additional time we are requesting, we are hopeful we can come to a Duchwald resolution without the need for further intervention from the Court.

The parties thank Your Honor for the Court's attention to these matters.

Respectfully submitted,

/S/

Gideon Orion Oliver